



# Texas 9-1-1 Alliance

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May 9, 2016

Honorable Tom Wheeler, Chairman  
Honorable Mignon Clyburn, Commissioner  
Honorable Jessica Rosenworcel, Commissioner  
Honorable Ajit Pai, Commissioner  
Honorable Michael O'Rielly, Commissioner  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: Concerns Regarding Impact of 9-1-1-related Smartphone Applications and Related Public Safety Services on Delivery and Processing of Requests for Emergency Assistance

Dear Chairman Wheeler and Commissioners:

The Texas 9-1-1 Alliance<sup>1</sup> (the "Alliance") has a long history of working with service providers and other stakeholders involved in emergency communications to ensure that 9-1-1 service continues to work effectively and efficiently. While the Alliance remains diligent in exploring ways to improve the delivery and processing of a request for emergency assistance, the recent introduction of new smartphone 9-1-1-related applications and related consumer services has created significant concerns on the part of the Alliance membership.

Based on our initial experiences to date with a growing array of new 9-1-1-related applications and services, certain operational and interoperability questions continue to arise, in part as a result of the uncertain current regulatory scheme applicable to these applications and services. Given the critical nature of public safety, the Alliance respectfully requests that the Commission consider the appropriate manner in which to address the following concerns regarding how these applications and services interface with existing 9-1-1 systems, which include, at a minimum:

- Ensuring that what is being added by way of a new service will not harm in any way how consumers currently access 9-1-1 service from a smartphone device.

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<sup>1</sup> The Texas 9-1-1 Alliance is an interlocal cooperation entity composed of 26 Texas Emergency Communication Districts with E9-1-1 service and public safety responsibility for approximately 63% of the population of Texas. These emergency communication districts were created pursuant to Texas Health and Safety Code Chapter 772 and are defined under Texas Health and Safety Code § 771.001(3)(B).

- Ensuring that the 9-1-1-related features of a new smartphone application or service have been thoroughly tested to specific standards, including interoperability and downstream dispatching considerations.
- Ensuring that 9-1-1 application providers are factually accurate in their marketing materials and do not mislead the public regarding how the product works, given the critical nature of 9-1-1 service and a request for emergency assistance.
- Prohibiting inaccurate claims from a 9-1-1 application provider that a state, regional, or local 9-1-1 governmental authority has approved, or supports or endorses, any particular product.
- Prohibiting inaccurate assertions from a 9-1-1 application provider that the lack of cellular or broadband coverage in any geographic area is a failure of the state, regional, or local 9-1-1 system.
- Ensuring that the addition of a "9-1-1 call button," a dedicated sequence of button use for 9-1-1 calling or 9-1-1 texting, or buttons for individual types of emergencies, will not accidentally generate repeated pocket dialed 9-1-1 calls or pocket dialed 9-1-1 texts from the consumer.
- Limiting or prohibiting applications designed to generate duplicate requests for emergency assistance "automatically" (e.g., having the smartphone generate a separate text-to-9-1-1 message when a person dials 9-1-1; or automatically sending a smartphone location link in the body of a text-message that could be viewed as a malicious link; or automatically sending a pre-recorded message that may go on too long or indefinitely; etc.).
- Providing for the development of specific standards or best practices for communicating and displaying supplemental consumer or incident information in the context of a 9-1-1 call for dispatching purposes, with the intent of improving emergency response.

Thank you for your attention to these critical issues, which have a profound impact on public safety. The Alliance membership stands ready to work with the Commission to develop reasonable solutions, so that the current long-standing expectation of the public of accurate and timely response to a request for emergency assistance remains unaffected.

Respectfully submitted,



Bill Buchholtz  
Chairman